





March 31, 2020

Eric Hansum Niemann & Heyer, L.L.P. Westgate Building, Suite 313 1122 Colorado Street Austin, Texas 78701-2101

Re: 2105 Real Catorce Drive, Austin, Texas 78746

Dear Mr. Hansum,

As you may know, your client has begun imposing fines with respect to alleged violations at the above-referenced address. It appears that the vast majority of these alleged violations involve the claim that residents of 2105 Real Catorce Drive (the "Real Catorce Residence") parked on the street for more than twelve hours at a time. After reviewing these allegations, we request a reasonable accommodation at least under current circumstances and we also request clarification, as detailed below.

My clients respectfully request a reasonable accommodation with respect to parking restrictions until the shelter-in-place orders are lifted in the City of Austin. A national emergency was declared in the United States on March 13, 2020. Social distancing guidelines were initiated on March 15, 2020. The City of Austin imposed shelter-in-place orders on March 24, 2020. These orders currently extend until April 13, 2020. To comply with these orders, the residents of the Real Catorce Residence must remain in place and cannot, therefore, move their vehicles elsewhere. An accommodation waiving the parking restrictions for the duration of the shelter-in-place orders is therefore reasonable.

My clients also request clarification, as they do not understand how the Board and its management personnel are determining these violations. My clients deny that residents are parking in the street for twelve hours at a time, other than as made necessary by the current health crisis, except that a few residents who came to the Real Catorce Residence after the district court's February 18, 2020, judgment, may have had some difficulty with the parking requirements as they cannot immediately seek employment and generally ride together with other residents and mentors during the earliest stages of their time transitioning out of a treatment facility. Further information and clarification from your client on the dates, times, and circumstances surrounding the alleged violations will allow my clients to determine whether and how such violations occurred and whether they need to seek related accommodations.

We would very much appreciate your response by the close of business (5:00 p.m. Central) of Wednesday, April 1, 2020, at least with respect to the issue of a reasonable accommodation as to the parking restrictions during the pendency of the shelter-in-place orders in Austin. Thanks very much, as always.



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Sincerely,

Mark Whitburn

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